

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JERRY D. GOODWIN, Individually and On Behalf of All Others Similarly Situated,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 10 cv 04905 (PGG)
)	
ANADARKO PETROLEUM CORPORATION,)	
JAMES T. HACKETT, ROBERT G. GWIN)	ECF Case
and M. CATHY DOUGLAS,)	
)	
Defendants.)	
)	
SHIRLEY HARRIS, Individually and On Behalf of All Others Similarly Situated,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 10 cv 05894 (UA)
)	
ANADARKO PETROLEUM CORPORATION,)	
JAMES T. HACKETT, ROBERT G. GWIN)	
and M. CATHY DOUGLAS,)	
)	
Defendants.)	
)	

**RESPONSE OF MOVANT, THE PENSION FUNDS INVESTORS' GROUP,
TO COMPETING MOTION FOR APPOINTMENT AS LEAD PLAINTIFF**

On August 23, 2010, pursuant to § 21D(a)(3)(B) of the Securities Exchange Act of 1934 (the “Exchange Act”), as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), 15 U.S.C. § 78u-4(a)(3)(B), the Pension Funds Investors’ Group (consisting of the International Union of Operating Engineers Pension Fund, Hallandale Beach Police Officers’ and Firefighters’ Personnel Retirement Fund and Miramar Police Officers’ Retirement Plan and Trust Fund) moved for, *inter alia*, appointment as lead plaintiff in connection with the above-captioned

securities fraud class actions. The only other motion for appointment as lead plaintiff was filed by the Pension Trust Fund for Operating Engineers and the Employees' Retirement System of the Government of the Virgin Islands (the "Competing Movant").

The PSLRA provides that there is a presumption that "the most adequate plaintiff ... is the person or group of persons" that, *inter alia*, "has the largest financial interest in the relief sought by the class." 15 U.S.C. § 78u-4(a)(3)(B)(iii)(I). In recognition of the reported losses of the Competing Movant, which amounts to more than \$1,150,000.00 based on the papers submitted on its behalf, and since there is no apparent basis to challenge the presumptive status of the Competing Movant as the most adequate lead plaintiff, the Pension Funds Investors' Group respectfully submits that the Competing Movant should be appointed as Lead Plaintiff and that its choice of counsel, Bernstein Litowitz Berger & Grossman LLP (which is an experienced and well respected firm that has the skills and resources necessary to zealously and appropriately represent the interests of the Class), should be approved as Lead Counsel.¹ To the extent the Court determines that the Competing Movant should not be appointed as lead plaintiff for any reason, the Pension Funds Investors' Group stands ready to serve as the lead plaintiff or, in the alternative, as a class representative, should the Court or any appointed lead plaintiff deem such designation appropriate and just under all of the circumstances.

¹The Pension Funds Investors' Group purchased a total of 14,282 shares of Anadarko common stock during the Class Period and, after subtracting for shares sold and retained, has suffered estimated losses in excess of \$147,000.00.

Dated: September 3, 2010

SHEPHERD, FINKELMAN, MILLER & SHAH, LLP

/s Patrick A. Klingman

James E. Miller
Patrick A. Klingman (PK-3658)
Karen Leser-Grenon
SHEPHERD, FINKELMAN, MILLER & SHAH, LLP
65 Main Street
Chester, CT 06412
Telephone: (860) 526-1100
Facsimile: (860) 526-1120
Email: jmiller@sfmslaw.com
pklingman@sfmslaw.com
kleser@sfmslaw.com

Jayne A. Goldstein
Nathan C. Zipperian
SHEPHERD, FINKELMAN, MILLER & SHAH, LLP
1640 Town Center Circle, Suite 216
Weston, FL 33326
(954) 515-0123
(954) 515-0124 (facsimile)
Email: jgoldstein@sfmslaw.com
nzipperian@sfmslaw.com

Scott R. Shepherd
Eric L. Young
SHEPHERD, FINKELMAN, MILLER & SHAH, LLP
35 East State St.
Media, PA 19063
(610) 891-9880
(610) 891-9883 (facsimile)
Email: sshepherd@sfmslaw.com
eyoung@sfmslaw.com

Robert D. Klausner
Klausner & Kaufman, P.A.
10059 Northwest 1st Court
Plantation, FL 33324
(954) 916-1202
(954) 916-1232 (facsimile)
Email: bob@robertdklausner.com

**Attorneys for Movant,
The Pension Funds Investors Group**